



**DEPARTMENT OF ENVIRONMENT AND CONSERVATION  
TENNESSEE DIVISION OF AIR POLLUTION CONTROL  
ANNUAL INSPECTION**

**Reference No.:** 01-0234  
**State Class:** CM  
**Pollutant(s):** PM, VOC & HAP

**Environmental Specialist:** MLC  
**Route To:** VNM

**Date Inspected:** June 10, 2009

**Company:** Shawmut Advanced Material Solutions  
**Location address:** 325 J.D. Yarnell Industrial Parkway  
**City/State/Zip:** Clinton, Tennessee  
**Mailing Address, if different:**

**Company Contact/Title:** Kevin Souza  
**Phone:** (508) 588-3300 xt 344

**Does Company impact an additional control area?** YES/NO: No  
**If Yes, pollutant type:**

**Does Company have:** NSPS (Part 60)? No      PSD? No  
                                 NESHAPS (Part 61)? No      MACT (Part 63)? No

**If YES, give subpart for NSPS, NESHAPS, MACT**

**Sources** If YES to any, indicate point number(s):

**Date of the last annual inspection:** First Inspection for the Company  
**Time period covered by this inspection, from:** January 2008 to April 2009  
**Is inspection partial or comprehensive?** Comprehensive

**Total time required for this inspection (hours):**

**Was company in compliance during entire inspection time period?** No

**If NO, explain in final paragraph**

**If CM source:** **Date annual report received in EFO:** March 09, 2009  
**Date annual report review complete/acknowledged by EFO:** June 9, 2009  
**Did annual report have deviations from permit conditions (Y/N)?** No

**EXECUTIVE SUMMARY:**

On June 10, 2009, Martie Carpenter met with Mr. Kevin Souza and Mr. Larry Lovell to conduct the 2008-2009 annual inspection at Shawmut Advanced Material Solutions in Clinton, Tennessee. Shawmut manufactures textile material for the automotive and boating industry. The facility is permitted for three laminators. The laminators apply flexible polyurethane foam to fabric, film or vinyl.

The facility is classified as a Conditional Major Source. The facility was issued a Conditional Major Permit on February 15, 2008 that expires on February 1, 2018. The facility is permitted for three natural gas-fired flame laminators. This is the first comprehensive inspection conducted at this source

**Conditional Major Permit #461613P**

**Date Issued: February 15, 2008**

**Date Expires: February 1, 2018**

**Textile Production**

**Natural gas-fired flame laminators**

**A pinhole dye tester with each laminator**

**Condition 1:** Justin Keppy is not the responsible official to represent and bind the facility in environmental permitting affairs. Mr. Keppy ceased being the responsible official in late 2008. The facility was issued a NOV for notifying the Division of the change of the responsible official on June 19, 2009.

**Condition 2:** Is an informational condition with no compliance method.

**Condition 3:** Is an informational condition with no compliance method.

**Condition 4:** Is an informational condition with no compliance method.

**Condition 5:** Visible emissions from the source shall not exceed 20% opacity as determined by EPA Method 9. During the on-site inspection, the inspector did not observe any visible emissions from the stacks.

**Condition 6:** VOCs emitted from this facility shall not exceed 24 tons during all intervals of 12 consecutive months. The records were reviewed from January 2008 to April 2009. The highest twelve-month interval occurred in April 2009 with 0.490250 tons of VOC being emitted.

**Condition 7:** Emissions of any HAP shall not exceed 15.30 pounds per hour of HCL on a monthly average basis and 9.0 tons during all intervals of 12 consecutive months. Emissions of any combination of HAPs shall not exceed 24 tons during all intervals of 12 months. The highest monthly average for HCL occurred in September 2008 with 0.332771 tons being emitted. The highest twelve-month for HCL occurred in March 2009 with 0.938553 tons being emitted. HCL is the only HAP emitted at the facility.

**Condition 8:** The Division has not required the facility to show proof of compliance with the emissions for Particulate matter, Volatile content and Hydrochloric Acid by EPA Method 5, 24 and 26, respectively.

**Condition 9:** The facility maintains a record of the purchase order and invoices of all VOC and HAP containing materials. The purchase orders and invoices are maintained at the Corporate Office in West Bridgewater, Massachusetts. The records were e-mailed and reviewed on June 11, 2009.

**Condition 10:** The facility maintains a tabular format of the as-supplied VOC content of all VOC-containing materials.

**Condition 11:** The facility must calculate the actual quantities of VOC and HAPs emitted from this facility during each calendar month.

Log1 – monthly emissions from the laminators  
Log2- VOCs and HAPs from other operations at the facility  
Log3- 12 consecutive month summary

The facility maintains the required records. The records were reviewed from January 2008 to April 2009.

**Condition 12:** Is an informational condition with no compliance method.

**Condition 13:** The facility submitted the annual report on March 9, 2009 to the Knoxville Field Office.

**Condition 14:** The permit does not expire until February 1, 2018.

#### **01- Natural gas-fired flame laminator used for textile production**

**Condition 15:** Only natural gas is used as the fuel source for the laminator.

**Condition 16:** Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2008 to April 2009. The highest monthly average for Particulate matter emissions occurred in November 2008 with 1.56 pounds/hour being emitted.

**Condition 17:** Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2008 to April 2009. The highest monthly average for Hydrochloric acid emissions occurred in November 2008 with 1.85 pounds/hour being emitted.

**Condition 18:** The Hydrogen Chloride (HCL) exhaust gases from the N.G. laminator stacks shall be discharged unobstructed vertically upwards to the ambient air from each stack with an exit diameter of 2.33 feet no less than 46 feet above ground level. The facility has not made any changes to the stack.

#### **02- Natural-gas fired flame laminator used for textile production**

**Condition 19:** Only natural gas is used as the fuel source.

**Condition 20:** Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2008 to April 2009. The highest monthly average for Particulate matter emissions occurred in January 2009 with 1.03 pounds/hour being emitted.

**Condition 21:** Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2008 to April 2009. The highest monthly average for Hydrochloric acid emissions occurred in January 2009 with 1.26 pounds/hour being emitted.

**Condition 22:** The Hydrogen Chloride (HCL) exhaust gases from the N.G. laminator stacks shall be discharged unobstructed vertically upwards to the ambient air from each stack with an exit diameter of 2.33 feet no less than 46 feet above ground level. The facility has not made any changes to the stack.

#### **03- Natural-gas fired flame laminator used for textile production**

**Condition 23:** Only natural gas is used as the fuel source.

**Condition 24:** Particulate matter emitted from this source shall not exceed 5.27 pounds per hour based on a monthly average. The records were reviewed from January 2008 to April 2009. The highest monthly average for Particulate matter emissions occurred in April 2009 with 0.30 pounds/hour being emitted.

**Condition 25:** Hydrochloric acid emissions shall not exceed 5.10 pounds per hour based on a monthly average. The records were reviewed from January 2008 to April 2009. The highest monthly average for Hydrochloric acid emissions occurred in April 2009 with 0.39 pounds/hour being emitted.

**Condition 26:** The Hydrogen Chloride (HCL) exhaust gases from the N.G. laminator stacks shall be discharged unobstructed vertically upwards to the ambient air from each stack with an exit diameter of 2.33 feet no less than 46 feet above ground level. The facility has not made any changes to the stack.

## NOV

On June 10, 2009, personnel from the Division of Air Pollution Control conducted an annual inspection at Shawmut Corporation in Clinton, Tennessee. During the review of the records, the inspector discovered a violation with the Conditional Major Permit (#461613). Condition one of the permit states that a written notification must be submitted to the Technical Secretary of the Division of Air Pollution Control within thirty days of changing the responsible official. During the site inspection, it was discovered that Mr. Justin Keppy has not been the responsible official since the end of 2008. A NOV was issued on June 19, 2009.

Based upon the file review, the site inspection, and the review of the records, it is the conclusion of this inspector that Shawmut Corporation is out of compliance in that there was a compliance problem found and a Notice of Violation was issued.

Malcolm J. Caputo

Inspector's Name

VEE Certification Number: 1488

Certification Expiration Date: 09/22/09

I verify that the format and content of this report conforms to established TN Division of Air Pollution Control annual inspection standard operational procedures guidance and that the compliance determination made in this report is correct.

V.N. Malut

Supervisor/Manager

6/24/09

Date